

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

VIRGINIA HERRMANN,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

SAM'S EAST, INC. d/b/a SAM'S CLUB #6474

Defendant.

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Case No. 4:20-cv-00706

JURY TRIAL DEMANDED

**DECLARATION OF JEFFREY WADLIN IN SUPPORT OF DEFENDANT'S MOTION
TO COMPEL ARBITRATION OR, IN THE ALTERNATIVE, TO DISMISS**

1. I am currently employed as Senior Director, Portfolio Management, Sam's Club. I have held this position for approximately two years. I have been employed by Walmart, Inc. for four years. I am authorized to make this declaration on behalf of Sam's East, Inc.

2. Through my role as Senior Director, Portfolio Management, Sam's Club, I have personal knowledge of the facts discussed below, as well as the documents attached to this Declaration as Exhibits A to E, which collectively comprise the contractual documents pertaining to Plaintiff Virginia Herrmann's membership with Sam's Club.

3. Attached to this declaration as Exhibit A is a true and correct copy of the receipt for Plaintiff's February 2, 2019 membership renewal with Sam's Club.

4. Attached to this declaration as Exhibit B is a true and correct copy of a membership brochure that lists Sam's Club's membership tiers after Sam's Club's membership restructuring in February 2018, and the specific benefits available to each tier after that restructuring.

5. Attached to this declaration as Exhibit C is a true and correct copy of the Terms and Conditions governing Sam's Club's membership agreements during the year 2019.

6. Attached to this declaration as Exhibit D is a true and correct copy of a document mailed to Plaintiff to notify her of the changes to her membership Terms and Conditions, which became effective February 1, 2020. Between January 22 to January 28, 2020, a copy of this document was delivered to the place of residence associated with Plaintiff's Sam's Club membership.

7. Attached to this declaration as Exhibit E is a true and correct copy of the Revised Terms and Conditions governing Sam's Club's membership agreements, effective February 1, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2020.



JEFFREY WADLIN